

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

CHARLIE JAVICE and OLIVIER AMAR,

Defendants.

Case No.: 1:23-cr-00251-AKH

**DEFENDANT OLIVIER AMAR'S
NOTICE OF MOTIONS *IN LIMINE***

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated January 13, 2025, Defendant Oliver Amar, by and through his undersigned counsel, hereby moves this Court before the Honorable Alvin K. Hellerstein, at the United States Patrick D. Moynihan U.S. Courthouse, 500 Pearl St., New York, New York, on February 4, 2025 at 10:00 a.m., or at such other time that counsel may be heard, for an Order precluding the Government from arguing, introducing evidence, and/or soliciting testimony regarding potential buyers of Frank that were neither identified in the Indictment nor adequately disclosed to the defense (“*Motion in Limine 1*”); precluding the Government from arguing, introducing evidence, and/or soliciting testimony regarding any alleged fraud perpetuated against the Government’s so-called “intended victims” that were mere prospects identified for outreach and/or “pitched” about the opportunity to acquire Frank (“*Motion in Limine 2*”); and precluding the Government from arguing a single fraudulent scheme against the two specified targets in the Indictment—“Bank-1” and J.P. Morgan Chase—and any other potential acquirors (“*Motion in Limine 3*”).

PLEASE TAKE FURTHER NOTICE that pursuant to the Court’s Order of September 24, 2024, the United States shall serve its response by January 27, 2025.

Dated: January 13, 2025

Respectfully submitted,

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